

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

-----X
A & E HARBOR TRANSPORT, INC.,

Plaintiff,

v.

TRI-COASTAL DESIGN GROUP, INC.,
and VOTUM ENTERPRISES, LLC,

Defendants.

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CIVIL ACTION

Case No.: 2:20-cv-18509-SRC-CLW

NOTICE OF MOTION

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, and Declaration, including all exhibits, Defendant Votum Enterprises, LLC will move this Court, before The Honorable Judge Stanley R. Chesler, U.S.D.J., at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, Court Room: PO No. 2, on the 1st day of March, 2021, or as soon thereafter as counsel can be heard, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff's Amended Complaint against Defendant Votum Enterprises, LLC (Dkt. Entry #3).

Dated: January 29, 2021

LAW FIRM OF TEDD S. LEVINE, LLC

By: /s/Tedd S. Levine
Tedd S. Levine, Esq.
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*Attorneys for Defendant
Votum Enterprises, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2021, the foregoing documents were served on Plaintiff's counsel in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the District of New Jersey. Service was made upon the following parties:

Via email and U.S. Mail

Michael Schwartzberg, Esq.
650 Bloomfield Avenue, Suite 100
Bloomfield, NJ 07003

Attorney for Plaintiff

A handwritten signature in black ink that reads "Tedd Levine". The signature is written in a cursive, flowing style. The first name "Tedd" is written with a large, looped 'T' and the last name "Levine" follows in a similar cursive script.

Tedd S. Levine, Esq.
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